



*South Carolina*  
**DEPARTMENT OF CONSUMER AFFAIRS**  
293 Greystone Boulevard Suite 400  
P. O. BOX 5757  
COLUMBIA, SC 29250-5757

Carri Grube Lybarker  
Administrator/  
Consumer Advocate

**PROTECTING CONSUMERS SINCE 1975**

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January 25, 2022

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Docket No. 2021-361-G  
Application of Dominion Energy South Carolina, Incorporated for the Approval of New  
Natural Gas Energy Efficiency Programs and Notice of Intent to Seek Net Lost Revenue  
under the Natural Gas Rate Stabilization Act.

Dear Ms. Boyd:

Please find enclosed for filing the Petition to Intervene on behalf of the South Carolina  
Department of Consumer Affairs. As indicated on the Certificate of Service, all parties of record  
will be served via electronic mail.

Regards,

Roger Hall, Esq.  
*Deputy Consumer Advocate*

Enclosures

Cc: Parties of Record (via email)

ADMINISTRATOR  
Tel.: (803) 734-4233

PUBLIC  
INFORMATION  
Tel.: (803) 734-4296

CONSUMER  
ADVOCACY  
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LEGAL/  
LICENSING  
Tel.: (803) 734-0046

CONSUMER  
COMPLAINTS  
Tel.: (803) 734-4200

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UNIT  
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PROCUREMENT &  
ACCOUNTING  
Tel.: (803) 734-4264

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-361-G**

IN RE: )  
 )  
Application of Dominion Energy South )  
Carolina, Incorporated for the Approval of )  
New Natural Gas Energy Efficiency )  
Programs and Notice of Intent to Seek Net )  
Lost Revenue under the Natural Gas Rate )  
Stabilization Act (Application Does Not )  
Include a Request for a Rate Increase)

**PETITION TO INTERVENE**

Carri Grube Lybarker, Administrator and Consumer Advocate for the South Carolina Department of Consumer Affairs (“Department”), respectfully petitions the South Carolina Public Service Commission (“Commission”) for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. Dominion Energy South Carolina, Inc. (“DESC”) has filed for a) authority to create four new demand reduction and energy efficiency programs (“Demand Side Management” or “DSM”) for the Company’s residential and commercial natural gas customers; b) authority to modify, expand, amend, or add any measure or program proposed in this Docket without the requirement to seek prior Commission approval to do so; c) authority to create a new Rider to Retail Gas Rates—Demand Side Management Component (“Gas DSM Rider”) for the recovery of the program costs arising from the new natural gas DSM program and the shared savings incentive (“SSI”) of 9.9%, thus matching the electric DSM SSI granted in Order No. 2019-880; and d) notice of intent to recover the net lost revenues resulting from the proposed DSM programs through the annual Natural Gas Rate Stabilization Act (“RSA”) proceeding under S.C. Code Ann. § 58-5-400, *et seq.*

2. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Department may provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service

Commission. In that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 2021-361-G

3. The Department works to avoid excessive, inadequate, and unwarranted rate increases. Upon information and belief, the application of DESC may impact rates for South Carolina consumers; however, the Department's position has not yet been fully developed on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

4. Counsel representing the Consumer Advocate/Department in this proceeding are:

Carri Grube Lybarker, Esquire  
 Roger P. Hall, Esquire  
 Connor J. Parker, Esquire  
**S.C. Department of Consumer Affairs**  
 293 Greystone Blvd., Suite 400  
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 Columbia, South Carolina 29250-5757  
 Phone: (803) 734-0045  
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 Email: [rhall@scconsumer.gov](mailto:rhall@scconsumer.gov)  
 Email: [cjparker@scconsumer.gov](mailto:cjparker@scconsumer.gov)

5. The Consumer Advocate/Department consents to service via electronic mail and requests all communications regarding this docket be directed to counsel of record noted above.

**WHEREFORE**, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests the Commission grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire  
 Administrator / Consumer Advocate

By: s/ Carri Grube Lybarker  
 S.C. Department of Consumer Affairs  
 293 Greystone Blvd., Suite 400  
 P.O. Box 5757  
 Columbia, South Carolina 29250-5757  
 Phone: (803) 734-0045

January 25, 2022  
 Columbia, South Carolina

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-349-E**

IN RE: )  
)  
Application of Dominion Energy South )  
Carolina, Incorporated for the Approval of )  
New Natural Gas Energy Efficiency )  
Programs and Notice of Intent to Seek Net )  
Lost Revenue under the Natural Gas Rate )  
Stabilization Act (Application Does Not )  
Include a Request for a Rate Increase)

**CERTIFICATE OF SERVICE**

I hereby certify I have caused to be served this day the **Petition to Intervene** to the individuals listed below via electronic mail as follows:

K. Chad Burgess  
Email: [chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)

Nicole M. Hair  
Email: [nhair@ors.sc.gov](mailto:nhair@ors.sc.gov)

Matthew W. Gissendanner  
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s/ Joan Williams  
Joan Williams, Paralegal

January 25, 2022  
Columbia, South Carolina